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STATE OF ILLINOIS)
) SS:
COUNTY OF LAKE)

PUBLIC MEETING)
REGARDING:)
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OUTBOARD MARINE COMPANY/)
WAUKEGAN COKE PLANT SUPERFUND)
SITE.)

REPORT OF PROCEEDINGS had at the above
entitled meeting, taken before Cindy Benner, C.S.R.,
a notary public within and for the County of Lake
and State of Illinois at the Waukegan Public
Library, 128 North County Street, Waukegan, Illinois
on Wednesday, March 3, 1999 at the hour of 7:00 P.M.

Reported by:
Cindy Benner, C.S.R.
L & L REPORTING SERVICE, INC.
9 North County Street
Waukegan, Illinois 60085

1 MS. POPE: Good evening and welcome to the
2 meeting tonight. My name is Janet Pope and I'm a
3 community involvement coordinator with the U.S.
4 Environmental Protection Agency.

5 Tonight our task is to present you with a
6 proposed cleanup plan for the Outboard Marine
7 Company/Waukegan Coke Plant Superfund Site.

8 I hope everybody when they entered in
9 signed in. When you sign it, it keeps your name on
10 our mailing list and we can give you all of the
11 updated information once we get it. So I hope
12 everybody signed in when they entered. If not, you
13 can sign in before you leave.

14 I would like to emphasize your role in
15 tonight's meeting. It's a very important role. If
16 you received a fact sheet in the mail, then you're
17 aware of the public comment period that we have for
18 the site. The comment period ends March 23rd. So
19 if you have any comments on the proposed plan or the
20 alternatives that Mike is going to present tonight,
21 please send in your comments. They can be in
22 writing, E-mail, whatever. Just send your comments
23 in and Mike will have those.

24 During the presentation -- we'll go over

1 the agenda first. Currently I'm doing the format
2 from the introduction and then we'll have Leo
3 Rosales, who is a community involvement coordinator
4 with me, he'll do some brief greetings in Spanish,
5 and then I'm going to have Mike Bellot, who is going
6 to present the proposed plan.

7 Then we will have a question and answer
8 period. Now, at the question and answer period, if
9 you have any questions that you want answers to,
10 that's the time to ask your questions, because when
11 we get into the public comment period which follows
12 immediately after that, we won't respond to those
13 comments. Those comments or questions will be
14 responded to in what we call a responsiveness
15 summary. So if you have any questions that you need
16 answers to, please ask them in the question and
17 answer period and I'll make the distinction between
18 those two when they come up. I'll say, "Now we're
19 in the question and answer period. Now we're in the
20 public comment period," and I'll remind you of those
21 things. Okay.

22 So now at this time I would like to
23 introduce a few people that we have here. First we
24 have Susie Schieber, who is from CAG here. Susie is

1 over there. Everybody knows Susie. And then we
2 have Jerry Willman, who is from the Illinois EPA.
3 He's in the back. Then we have, again, Leo Rosales
4 here with the U.S. EPA. And then we have Mike
5 Bellot. Then we have Cindy Benner here, who's a
6 court reporter. She's going to be recording this
7 meeting in its entirety and a transcript of this
8 meeting will be available within two to three weeks
9 in the information repository that's upstairs, and
10 you can read it or get a copy of it. If you want a
11 copy of the transcript, you can call me up and say,
12 "Hey, Janet, can I have a personal copy," fine, we
13 can send you those things.

14 At this time Leo Rosales will come up and
15 give brief greetings in Spanish.

16 MR. ROSALES: Hello, everybody. I'm just
17 here to answer any questions people may have in
18 Spanish. We understand that this is a Hispanic
19 community here. Let me repeat this in Spanish now.

20 (Whereupon, Mr. Rosales speaks in Spanish.)

21 MR. ROSALES: So what I just said was that
22 I was going to be here after the meeting to respond
23 to those questions in Spanish. Thank you very much.
24 Michael?

1 MR. BELLOT: My name is Michael Bellot.
2 I'm also here representing the U.S. Environmental
3 Protection Agency, and I again want to thank you all
4 for coming. I know how difficult it is to come out
5 on a Wednesday night, so I wanted to make sure that
6 I first of all thanked you.

7 I also when I was preparing this asked
8 myself, "What would I want to know if I was sitting
9 in this crowd? So to make this as user-friendly for
10 you as possible, I sat down and I came up with a
11 series of questions that during my presentation I
12 intend to answer, and I will go through those
13 questions first.

14 First of all, by the time you leave, you
15 should be able to say, "What activities occurred at
16 this site? When did they occur? What kind of
17 contamination is there? Where is the contamination
18 and what are the concentrations? What are you
19 planning to do? Why did you choose this particular
20 remedy? Is it safe around that site? How do I know
21 it's going to be safe? When is this cleanup going
22 to begin? How long is it going to take? Who's
23 going to pay for it? Where can I go if I want more
24 information?"

1 So by the time -- at the end of this
2 discussion we're going to come back to these
3 questions and I'm going to visit each one of them to
4 make sure that all those questions are answered, and
5 then if you have additional questions at the end,
6 we'll go over them one by one if you would like.

7 What I'm going to talk to you about today
8 is about the proposed plan, and before I do that, I
9 want to talk to you about the Superfund process so
10 you can see where this site is in this Superfund
11 process you hear about.

12 The next thing I would like to do is talk
13 about the site background. I would like to then
14 talk about the types and the locations of
15 contamination. I would then like to talk about the
16 remedies evaluated, the proposed remedy, the remedy
17 that we would like you to help us choose, the
18 schedule, and then we'll go into a question and
19 answer kind of on the technical aspects of this
20 site. So we'll have a lot of information right off
21 the bat so you will be able to put your thoughts
22 together.

23 The first thing I would like to do then is
24 talk about the Superfund process. This is the

1 typical Superfund process. It begins with site
2 discovery, and site discovery can happen in a
3 multitude of ways. Someone may call us and say
4 there's a problem. Someone may report a spill. So
5 site discovery can happen in a lot of different
6 ways.

7 The next box says PA SI. You're going to
8 get a long list of government acronyms and I promise
9 you I will try to explain every single one of them.
10 If I don't, raise your hand and say so. PA means
11 preliminary assessment. SI means site inspection.

12 What you do in a preliminary assessment is
13 you go get available records, you take a look at the
14 available records, and you try to determine what
15 kinds of wastes are at this site, how toxic are
16 they, have they been released, and you do this
17 basically on a record search.

18 If you go through this record search and
19 you find that a particular facility has a lot of
20 waste or has potential for release, you do this SI,
21 the site investigation. You go out there and take
22 some samples to check and see if the soil or the
23 groundwater, if there is actual contaminants
24 present.

1 If that happens and you have contaminants,
2 it then again goes on to the NPL, the National
3 Priorities List. This is the technical term for
4 Superfund. When you hear the word Superfund, what
5 they're really talking about is the National
6 Priorities List. The National Priorities List
7 allows EPA to spend money to clean a site up.

8 After it's placed on the National
9 Priorities List, an RS is conducted. RI stands for
10 remedial investigation. The purpose of the remedial
11 investigation is to determine the nature and the
12 extent of contaminantion, what kind of contaminants
13 are out there, where are they located, and at what
14 concentrations.

15 After you do the remedial investigation,
16 you next do the feasibility study. So you
17 understand in the remedial investigation these are
18 the kind of contaminants we have at these
19 concentrations.

20 The feasibility study looks at all the
21 different remediation technologies that are out
22 there and you try to find the best fit for the
23 contaminants that you have. Often sites -- and this
24 site is the same as many -- you have a multitude of

1 contaminants in multiple media, and multiple media
2 means you have it in soil, you have it in the
3 groundwater, you may have it in the surface water,
4 and oftentimes -- actually many times you cannot use
5 the same technology for different contaminants in
6 different media. So the feasibility study is a very
7 detailed document. It goes through each one of the
8 media, each one of the contaminants, and what it
9 does is it screens out an awful lot of technology
10 early on.

11 After the feasibility study, which is where
12 we are right now in this process, we are at the
13 proposed plan process. What the proposed plan does
14 is the EPA takes a look at the feasibility study and
15 says, "Of all these alternatives, which one seems to
16 hold the most promise," and then we come out to the
17 community and try to get community input on what
18 they think is important in a remedy-making decision.

19 I want to stress right now this remedy
20 decision has not been made. This is an opportunity
21 for everyone to get as involved as they would like
22 to in the remedy decision process. We're not coming
23 out here to tell you this is what we've chosen.
24 We're coming out here to say this is the one we're

1 leaning towards based on the criteria we have.

2 Let's see if it matches your criteria.

3 After the proposed plan, we've got a thirty
4 day comment period, which we're in right now. At
5 the end of thirty days, we're going to get all of
6 your comments at the end and we're going to develop
7 a responsiveness summary, which is a written
8 response to these questions, and then we're going to
9 put together this record of decision or ROD. A ROD
10 is EPA's decision document. It goes into the record
11 and lays out all of the rationale for making a
12 particular choice.

13 Between the proposed plan and the ROD we
14 can change remedies. We have before based on
15 community input. So I wanted you to understand that
16 your input is timely and it is important.

17 After the record of decision, then comes
18 the remedial design phase. Remedial design, I
19 always kind of equate it to building a house.
20 Before you build a house, there's a lot of pre-work
21 you have to do. You have to get your contractor;
22 you have to get your wood; you have to get your
23 permits; you have to get your location. That's what
24 the remedial design does for remediations. We

1 design the remedial activity.

2 After the remedial activity, then you move
3 into the remedial action. That's where you
4 implement -- that's when the contractor starts
5 pounding nails. That's remedial action. We'll talk
6 about this process as it relates to the Waukegan
7 Coke plant a little bit later and I'll give you some
8 timelines of when you can expect things to happen.

9 The significance of this overhead is mostly
10 the orange area. The site is actually located right
11 here, and what this tells you -- this is zoning
12 information, and the significance of this is you can
13 see that we're talking about a pretty industrial
14 corridor. The orange represents industrial. The
15 green represents parks. The yellow is public and
16 semi-public uses.

17 The significance here is the site is an
18 industrial area and for purposes of our evaluation,
19 we considered that it would probably continue to be
20 an industrial/commercial scenario.

21 Let me talk a little bit about the site
22 itself. Going back as far as 1893 we saw that EJ&E
23 Railroad owned the site. From approximately 1908 to
24 1917, in that neighborhood, there was a creosote

1 treatment operation that occurred on the site, and
2 what creosote is, if you have ever seen railroad
3 ties or telephone poles, they're often treated with
4 a black substance. It looks kind of tarry. It
5 keeps the bugs out. That's what the creosote
6 treatment did. They treated railroad ties probably.

7 From 1928 to 1969 there was a manufactured
8 gas and a Coke plant. There were multiple owners
9 during that time. So there's a couple of processes
10 that occurred from '28 to '69.

11 From 1972 to 1989 the site was largely used
12 by Outboard Marine Company, OMC. Not a whole lot of
13 manufacturing activities have occurred on the site
14 that we're going to be talking about. They've got a
15 lot of things that they're still doing there, but
16 the Coke plant site -- which we'll get to in a
17 minute -- has pretty much been vacant. There was
18 some parking that was done there; there was some
19 snowmobile testing. Larsen Marine is actually
20 storing some boats and some boat trailers. But for
21 the most part it's fenced off, it's kind of shrubby;
22 and its access is restricted.

23 In 1972 the remaining buildings -- there
24 were some buildings that were still on-site that

1 were demolished. So it's essentially a flat site
2 with a couple of hills and quite a bit of brush.

3 The EPA first became interested in the
4 Waukegan Coke plant as opposed to the Outboard
5 Marine Company in about 1990. What had happened is
6 previously Outboard Marine Company was conducting a
7 remediation of polychlorinated biphenyls, PCBs.
8 That was a process that OMC used oils in and the
9 PCBs were in the oils.

10 While they were doing this cleanup, they
11 developed three cells on site. If you want to think
12 in your mind what a cell looks like, it's kind of
13 like a clay briefcase. It's got clay sides, a clay
14 bottom, and a clay top. So these three cells were
15 developed on site to handle the PCBs. One of the
16 cells was actually the former Slip No. 3. A slip is
17 where they pull the boats in to work.

18 What they did is they built a little
19 suitcase around this slip, built it up with some of
20 the sediments, and capped it off. When they took
21 out an old slip, old Slip No. 3, they went to build
22 a new slip, Slip No. 4. When they started digging,
23 surprise, toxic treasure. They found this
24 creosote-contaminated soil, lifted up this

1 creosote-contaminated soil, and OMC put it on site,
2 and they have currently got it covered and they're
3 managing it on site, but what this told them was,
4 wait a minute, we have contamination at this site
5 that is not PCB contamination. We have some
6 contamination at this site that is very different,
7 and our remedy isn't designed to handle this, so we
8 need to take a look at this.

9 The other thing that I would say is the PCB
10 side of the story is for the most part cleaned up.
11 They've got the three cells on site, they're
12 working, the wastes are in them, so there's going to
13 be a long-term operation and maintenance of the PCB
14 cleanup, but we're really not going to talk about
15 that tonight. We just needed it from the
16 perspective that that's how we found out about this
17 other contamination. So now what we're going to
18 talk about is the actual contamination found at the
19 Waukegan Coke plant.

20 Once they found this creosote contamination
21 in 1992 and 1993, they did a two-phase remedial
22 investigation, RI, and what they did is they did 37
23 trenches. The reason that trenches are good is the
24 waste from the Coke plants is kind of black

1 tarry-looking stuff. It's easily distinguishable in
2 the soil. If you see it, you can start digging and
3 you can keep chasing it. So it's easily chaseable
4 in trenches.

5 They also took 33 soil samples. They also
6 did 78 borings to the till. Now, let me tell you a
7 little bit about what that means. If you look at
8 the geology of this particular peninsula, once they
9 put the breakwater in, sand started accumulating on
10 this peninsula, and the peninsula is much bigger now
11 than it was in the 1800's. It's much bigger. Most
12 of that is the result of the breakwater having sand
13 deposited there. It's kind of like when you're
14 building a sand castle at the beach, you take the
15 sand up, you bring it up to the top, you dump it and
16 you accumulate it. That's what has happened on this
17 peninsula.

18 So the majority of this peninsula is almost
19 exclusively sand from the surface all of the way
20 down to about thirty feet, and that's where there's
21 a glacial till. When the glaciers came through,
22 they left this till down there. So you've got sand
23 almost completely down to thirty feet.

24 They did 78 borings across this site and

1 they took a boring at about every four feet. So
2 we're looking -- if you do the math there, 300 and
3 some borings -- 300 and some samples in those 78
4 borings. So there's a lot of soil data out there.
5 In some places they even dug down into this glacial
6 till. They drilled down into the glacial till to
7 see where the contaminants stopped because they know
8 that the contaminants were migrating downward. So
9 there is a lot of samples to determine how deep the
10 contamination went.

11 So what did they find? There's three
12 things to remember on the soil. The first one is
13 polynuclear aromatic hydrocarbons, PAHs. That's
14 your traditional manufactured Coke plant kind of
15 waste. We're not at all surprised to find PAHs
16 there.

17 The second thing they found is arsenic.
18 Now, remember we're only talking about soils now.
19 And the other thing is creosote contamination.

20 Soils, there's three things to remember:
21 PAH contamination, arsenic contamination, creosote
22 contamination.

23 The next thing that we should talk just for
24 a moment about is you kind of know what this soil

1 data is. What does it mean? What do you compare it
2 to? What the EPA does is they do a risk evaluation
3 and a baseline risk assessment. Actually, let me
4 clarify one thing. The samples weren't actually
5 taken by the EPA. They were taken by the North
6 Shore Gas Company, who is conducting the remedial
7 investigation. So we oversaw the sampling, but the
8 actual sampling was done by past owners and
9 operators.

10 One of the first things we do is we make an
11 assumption about what the future use of the site is
12 going to be because exposures are very different
13 depending upon what your future use is, and I think
14 you can probably see the difference between a
15 playground for a child and a building or asphalt.
16 You're just not going to have the soil exposure. So
17 we made some assumptions.

18 We didn't think it was realistic that there
19 would ever be a residential scenario here and
20 probably will hold true to that. We assume that
21 this is going that be a commercial/industrial
22 development. Once you kind of understand what your
23 exposure scenario is going to be, we then take a
24 look at the chemicals and we kind of break them down

1 into two pieces, whether they're a carcinogenic or a
2 noncarcinogenic risk, whether they cause cancer and
3 at what level, and there is also things that are bad
4 for you, but they're not really carcinogens. They
5 don't cause cancer; they just make you sick in other
6 ways. And the baseline risk assessment determines
7 the standards for this unacceptable risk.

8 What we found is there are discrete areas
9 in the soil that have an unacceptable risk for
10 future use for industrial and commercial scenarios.

11 Groundwater -- I've got to be honest with
12 you. This groundwater is really contaminated. It's
13 never been used for drinking water, and in all
14 likelihood we may not see that -- I don't think
15 we'll ever see that happen. This is
16 highly-contaminated groundwater.

17 So this is like an artistic rendition, if
18 you will, for the visual learners like myself of the
19 contamination. And we're only talking about soils
20 contamination here. Let me acquaint you with the
21 site.

22 Over here we have Lake Michigan. Here we
23 have the Waukegan Harbor. It winds around like
24 this. OMC Plant No. 1 is over here. OMC Plant No.

1 2 is over here. This would be Seahorse Drive right
2 here. The blue areas, those are PAH soils. The red
3 area, that is arsenic soils. So these are the areas
4 of unacceptable risk based on the industrial
5 scenario.

6 This little square right here -- I don't
7 know how well you can see that. That's a little
8 box. That is the creosote-contaminated soils, the
9 temporary storage pile. Right there is the Slip 4.
10 Over here is Slip 3. What they did is they filled
11 Slip 3 and when they went to build a new Slip 4 over
12 here, they found this creosote-contaminated soil
13 there.

14 The other thing that's on the site as a
15 very notable feature is there's a stockpile of
16 dredged sand that's also on the site. We'll talk
17 about that in a little while too.

18 But the important thing to take out of this
19 is there are multiple locations where there are PAHs
20 and there is one general location where there is
21 arsenic soil contamination at an unacceptable risk.

22 In addition to the soils, there was also a
23 groundwater study done and 35 groundwater wells were
24 installed and samples were taken. What we found was

1 things were a little different in groundwater than
2 they are in soils. Arsenic is still in groundwater,
3 but we've got some other things. We've got ammonia,
4 phenol, thiocyanate as the major groundwater
5 contaminants.

6 The other thing I want to mention is I'm
7 really telling you the major contaminants. There
8 are a myriad of little things that are out there
9 too, but the things that are really going to drive
10 the remedy are the things that we're talking about
11 today.

12 The RI is probably about that thick, and
13 they ran an analysis for just about every chemical
14 you can imagine. So we have a thorough
15 understanding of what was out there. I'm
16 summarizing for you the important things, the things
17 that are really going to make a difference in our
18 final analysis.

19 Groundwater, federal and state standards
20 are completely exceeded, way exceeded, not even
21 close, very, very high contamination above these
22 state and federal drinking water standards. Good
23 thing it's not drinking water. It's never been used
24 for drinking water. DNAPL, dense nonaqueous phase

1 liquids. What does that mean? If you have a glass
2 of water, for example, and you pour -- have you ever
3 seen that dark Karo syrup? You pour it in and it
4 goes right straight down to bottom and it sits and
5 it slowly kind of discharges over time. That's how
6 you can equate it to DNAPL.

7 One of the things a lot of times you find
8 at these manufactured Coke plants is this kind of a
9 waste and it really complicates the cleanup because
10 it's really hard to get out.

11 What our borings showed us is we really
12 didn't have that here. Everybody was expecting to
13 find it. The reason we didn't have it, we think, is
14 because the process, they actually distilled their
15 tars a little bit more and these lighter factions
16 would have come off. So the stuff that hit the
17 ground is the really heavy tar and it just kind of
18 sat there.

19 The other thing we found that was very
20 interesting, the reason we thought it was going to
21 be DNAPL is the groundwater contamination is pretty
22 much limited to the bottom five feet of the aquifer.
23 That's where it's the highest contamination.
24 There's contamination above it, but it's really

1 dense at the bottom, which would lead you to
2 believe, oh, it must be heavier and it just sank
3 there.

4 What's really happened is they stopped
5 discharging to the lagoon many, many years ago, and
6 if you remember, this is mostly sand, so all the
7 surface water that came in is going to push that
8 stuff down. It's going to push it down and it's
9 going to wash it out. So the shallower stuff is not
10 nearly as contaminated as the deeper stuff. The
11 deeper five feet is highly-contaminated groundwater.

12 The other thing we found is in addition to
13 this like layer across the bottom, there's a highly
14 contaminated slug or plume that's present. It kind
15 of has a kidney bean/thumbprint shape that we talk
16 about quite a bit.

17 This is an overhead that gives you a
18 feeling -- this is arsenic. You can see pretty much
19 there's contamination all over the site, but there
20 is this little thing right here that represents some
21 significantly contaminated groundwater, highly
22 contaminated.

23 This is phenol. You can see -- the
24 important things that you see here is there is again

1 this kind of area, but it's not exactly the same
2 shape as the arsenic. I don't know if you notice
3 that subtlety. They're similar, but they're not
4 exactly the same because these things have a
5 tendency to move a little bit differently in the
6 groundwater than one another.

7 And then finally, this is ammonia. I
8 didn't do all of them. I just wanted to kind of
9 cherry pick the ones that were really important.
10 You can see ammonia is clearly much more over the
11 site, and if look over here, we have another hotter
12 area over here. So we have the hotter area over
13 here and we have a hotter area over here with regard
14 to groundwater.

15 I would like to talk a little bit about
16 surface water. We've talked about soils. Soils are
17 PAHs, arsenic, creosote. Groundwater is arsenic,
18 ammonia, thiocyanate, and phenol. There is an
19 ongoing discharge to surface water. Remember, on
20 the west side we have the harbor. On the east side
21 we have Lake Michigan. This site is interesting in
22 that it has a groundwater divide where some
23 groundwater goes towards the harbor, some
24 groundwater goes towards the lake.

1 Where that highly-contaminated area was,
2 the lima bean or the thumbprint, that's moving
3 towards the lake. That other area that was down
4 close to the harbor, that's moving towards the
5 harbor. So we've got contamination going in two
6 different directions here.

7 On the lake side -- on the east side moving
8 towards Lake Michigan we have exceedances of the
9 State of Illinois surface water quality standards
10 for open waters for ammonia. I would like to talk a
11 little bit about the significance of that. Ammonia
12 is not a human health or an ecological standard in
13 this particular surface water standard. What
14 happened is the State of Illinois said, "We don't
15 want the quality of Lake Michigan to get any worse."
16 It's kind of like a natural -- a non-degradation
17 rule. They said this is kind of what it is now, we
18 don't want it to get any worse. It's 20 parts per
19 billion. It's remarkably low considering in the
20 harbor it's 15,000. So you can see that there's
21 quite a contrast.

22 But there is and probably will be for a
23 long time an ongoing discharge to Lake Michigan. So
24 one of the things that are important to us in trying

1 to come together with a remedy here is we need to
2 protect the surface water. I mean that's the bottom
3 line for us. So now you know a little bit about the
4 contamination.

5 Let me summarize it one more time. Soils,
6 we have arsenic, PAHs, creosote. Groundwater, we
7 have arsenic, ammonia, phenol, thiocyanate. Surface
8 water, we have discharge to surface water. Ammonia
9 seems to be a pretty significant thing for us with
10 regards to surface water.

11 After we've got all this data and we know
12 where the contamination is and how much, we did --
13 the PRP's and North Shore Gas did a feasibility
14 study that evaluates all the different options for
15 treating these contaminants in these media, and what
16 EPA is proposing to do tonight is to ask your help
17 in choosing a remedy. We're leaning towards one.
18 We would like to see what you guys think about it.

19 The feasibility study looked at a lot of
20 different things which I'm not going to go through
21 tonight. I just want to put them up here so you can
22 see. There's a lot of things for you to look at.

23 There's aerobic bioremediation, low
24 temperature thermal desorption, soil washing, fuel

1 blending and cement kiln incineration, slurry wall
2 mix design, phytoremediation. All these things were
3 looked at. So if you got all of this stuff, what do
4 you compare it to?

5 The EPA has criteria and we have nine of
6 them. First and foremost, is it protective of human
7 health and the environment? So we get these
8 remedies and we start laying them up against these
9 criteria.

10 Secondly, will it comply with regulations,
11 because there is more than just federal regulations,
12 there is state regulations and even local
13 regulations. So we want to make sure the remedy is
14 protective of human health and complies with
15 regulations.

16 Is it effective in the long-term? Is it a
17 permanent solution? We're always looking towards
18 remedies that have a reduction in toxicity or
19 mobility or the volume of contaminants. We're
20 looking for things that are effective in the
21 short-term. We're looking for things that are truly
22 implementable, it's not a grand dream. Cost is a
23 factor, if something is not financially feasible.
24 We look to the state, is this remedy acceptable to

1 the state. We'll specifically inquire to them and
2 actually work hand-in-hand with the state to make
3 sure they're okay with the remedy. And an important
4 part that we're doing tonight is to seek your input
5 on a remedy also.

6 Let's go through the remedies. There's
7 four of them and we'll move pretty rapidly through
8 them. The first alternative that EPA is required to
9 evaluate is the no action alternative. What if we
10 did nothing? What would happen then?

11 The second alternative, I'm going to break
12 it up into soil and groundwater and kind of piece
13 them for you. Soil, for the PAH soils, Alternative
14 2 recommends they go off-site and they be destroyed,
15 coburned. The creosote soils or the arsenic soils,
16 they would be stabilized on site or solidified.
17 What that means is you mix them into a matrix where
18 they're not -- where they will not migrate to
19 groundwater and they cannot cause an exposure
20 threat.

21 There would be an asphalt cap over a large
22 portion of the site. Whenever you create an asphalt
23 cap, you have to create a detention basin because if
24 you have rain water, it has to go someplace. So the

1 detention basin would take a big chunk of this site
2 also.

3 There would then be what's called
4 institutional controls, and what an institutional
5 control is, we restrict this property to industrial
6 or commercial uses and we restrict the property use
7 such that they can't interfere with this remedy.
8 They can't destroy the cap. We can't have the
9 continuity of the remedy impeded upon. So that's
10 the soils component for Alternative 2.

11 The groundwater component for Alternative 2
12 first considers containment, and that's the slurry
13 wall. That's you dig down, you put a clay wall in
14 it, and you try to capture the plume. Then you
15 would have to pump that water out, treat it, and do
16 something with that water once you pump it out and
17 treat it.

18 Additionally they would go after these two
19 hot areas, the fingerprint or the kidney bean, and
20 then the other hot area by the harbor, pump them up,
21 treat them, reinject them, and then there would be a
22 biointrinsic natural remediation afterwards.

23 There's been a rather large study done to
24 see how well things would break down in the

1 groundwater, and this is what we learned.

2 Contaminants are currently way too high to support
3 natural degradation. It is a -- it's a killing
4 environment for the bugs. Concentrations of these
5 groundwater contaminants are so high the bugs can't
6 thrive to help break down the chemicals. If we get
7 a one-third reduction approximately in the
8 contaminant concentrations, we start to see
9 degradation work rather rapidly and rather
10 successfully, but right now we have a prohibitive
11 situation.

12 Alternative 3 in a lot of ways is very
13 similar. Let me tell you what is different about
14 Alternative 2 and Alternative 3. Alternative 2,
15 first of all, with the soil, the first significant
16 difference is the flexible cover option. Asphalt
17 would limit future use of the site as proposed in
18 Alternative 2.

19 Alternative 3 would use a combination of
20 vegetative caps, buildings, and maybe some parking
21 lot type stuff. What it would do is it would
22 originally be put in as vegetation, which would
23 control infiltration. As surface water hits the
24 site, it migrates down, starts pushing the

1 contaminants. We want to stop that infiltration.
2 Plus the roots of these plants will break down
3 whatever residuals are left. It also allows for
4 future development of the site. They would have the
5 same institutional controls. We would limit the
6 future use.

7 Groundwater would have interim treatment.
8 You'd go after the two hot spots. You'd then have
9 monitored natural attenuation or intrinsic
10 bioremediation.

11 Alternative 4 is the Cadillac. This is
12 let's pick everything up that's contaminated on the
13 site, take the soil off-site, let's pump and treat
14 this groundwater until we meet MCLs.

15 Alternative 1 was the no action. It has no
16 cost, but it's not protective. So we can pretty
17 much eliminate no action as a possibility right off
18 the top.

19 Alternative 2 -- actually Alternative 2, 3
20 and 4 all meet all of the criteria. Well,
21 certainly -- let me back up. Alternative 2 and
22 Alternative 3 certainly meet all the criteria. All
23 those nine criteria we laid out, they met all of
24 those.

1 Alternative 2 runs 39 million. Alternative
2 3 runs 25 million. Both of them meet all of the
3 criteria. Alternative 4, they ran it out for thirty
4 years and they said at thirty years it's going to
5 cost a hundred million, and it may not be
6 technically practical to pump and treat this
7 groundwater in a reasonable amount of time to get to
8 MCLs. It may not be cost-effective. So if you took
9 that hundred million out -- that one is a pretty
10 costly remedy.

11 So what I think the EPA is leaning towards
12 right now is Alternative 3, which would include soil
13 removal. The PAHs would go off-site. They would be
14 coburned. The arsenic-contaminated soils would be
15 stabilized on site. There would be the use of a
16 flexible cover and there would be institutional
17 controls. The groundwater would include an interim
18 pump and treat system and a natural biodegradation
19 afterward.

20 Let me talk a little bit more about
21 specifically what the soils remedy would be. First
22 of all, there would be excavation and off-site
23 treatment of the PAHs by coburning. We're looking
24 at 7,000 to 15,000 cubic yards. What's a cubic

1 yard? A foot by a foot by a foot is a cubic foot.
2 27 of those is a cubic yard. So we're talking about
3 a pretty big volume of soil.

4 The on-site stabilization would probably be
5 a mechanical mixing with a stabilization agent or
6 concrete, something to that effect. We're looking
7 in the neighborhood of 3,000 to 7,000 cubic yards of
8 soil for the arsenic. Off-site treatment/disposal
9 of the creosote soils, we're looking at
10 approximately 4,500 cubic yards. Soil cover would
11 be a combination of vegetative, buildings and
12 pavement.

13 The institutional controls would be deed
14 restrictions for industrial/commercial use. And we
15 would also want a soils management plan, and what
16 that soils management plan says is, all right, we
17 understand now we have a vegetative cover. If we
18 want to develop this site in the future for a
19 particular use, what kind of standards are we going
20 to be held to? What kind of sampling are we going
21 to do? What will be the process of getting this
22 approved through the EPA for future development of
23 this site?

24 So here's what the site would look like.

1 These blue areas would be taken off site and this
2 red area would be stabilized on site and would
3 become a cover. Actually the site before the cover
4 comes on would be within the acceptable risk range.
5 So this cover actually adds an additional benefit to
6 the site. There may be multiple kinds of -- part of
7 it may be fido, part of it may be buildings. It's
8 just going to vary on what folks want to do in the
9 future. So that's the soils. The PAHs go off-site,
10 arsenic stabilized on site, creosote goes off site.

11 Groundwater, first of all, there would be
12 an interim groundwater treatment system. It would
13 be cell-based. And I'll tell you what cell-based is
14 in a minute. I've got some diagrams to show you.
15 This would require reinjection. You take the water
16 up and you need to do the reinjection. We would
17 have to have a waiver of federal and state
18 prohibitions against reinjection. I'll tell you why
19 that's important in a moment. Then we have the --
20 in terms of bioremediation, monitored natural
21 attenuation, there would be a long-term monitoring
22 for this site for the foreseeable future and there
23 would be a prohibition against drinking water wells.
24 There are none out there now, but there would be a

1 prohibition against them.

2 Here are the two areas of concern for the
3 interim pump and treat system. You've got your
4 kidney bean area here and you've got this zone over
5 by Slip 4. What they do is -- this is a planned
6 view looking down. You're looking down at the soil.
7 It's 100 feet by 200 feet. In the middle of this
8 cell are ten pumping wells. They're like straws
9 down to the aquifer to suck the water up. The water
10 then goes to a treatment center which we'll talk
11 about in a minute, comes back to the reinjection
12 wells, and filters back down into the same cell. So
13 you've got it coming up and going down. So you get
14 a washing effect to this zone and we're going to try
15 to determine how many times you have to do a
16 complete pour volume through this zone to get it to
17 clean up.

18 Once it comes up, it goes off and there's a
19 two-step process here. There's electrochemical
20 precipitation to try to get the inorganic arsenic
21 removal and then there's an activated sludge, and
22 what that does is that's going to attack the
23 phenols, the organics, and the ammonia. What it's
24 going to do is it's going to change that ammonia to

1 nitrate and it's going to oxygenate the water so the
2 water that is returned to the aquifer is going to
3 have a food source for bioremediation and it's going
4 to have oxygen to help stimulate the breakdown after
5 the treatment system has been completed.

6 How they'll start is they'll start with
7 four cells at a time and they'll pump those cells,
8 and when those are done, then they'll go to another
9 four, and when those are done, then they'll go to
10 another four until they have completely covered
11 these two areas.

12 So what's it going to cost? To do this,
13 the capital cost, in other words -- the pieces
14 you've got to build to construct it runs 14 million
15 dollars, 14.1 millions. O & M is operation and
16 maintenance. How much money do you have to have in
17 the bank to pay for this system once you build it
18 and you operate it? That's another approximately 11
19 million. The creosote-contaminated soils were not
20 contained in the feasibility study. If we want the
21 creosote-contaminated soils to also be managed,
22 that's going to be another 1.5 million. So we're
23 looking at a proposed remedy of about 26.5 million
24 dollars.

1 Let me just real quickly bounce one more
2 time Alternative 2 and Alternative 3 because
3 Alternative 1 really wasn't protective and
4 Alternative 4 is pretty costly.

5 Alternative 3 we feel is protective, which
6 is the fundamental, important criteria. It's
7 effective and it's practical. It also allows for
8 maximum future development potential. And we're
9 looking at 26.5 million dollars.

10 Alternative 2, the real probably crucial
11 element was you could put in this slurry wall, but
12 it's very close to Lake Michigan, and how are you
13 going to control the water from getting inside the
14 slurry wall, and it's very expensive to pump that up
15 and it really doesn't make the groundwater that much
16 safer, so is there a real value to having a slurry
17 wall? Also, we felt that the asphalt portion on the
18 soils side severely limited any future use of the
19 site. And we're looking at 39 million, an extra 12
20 and a half.

21 So let's go back over the questions real
22 quick just to make sure that I've got them all.
23 What activities occurred at the site? We know in
24 the late 1800s, wood treaters. In the early 20's --

1 actually it was 1908 to 1917 -- was the wood
2 treaters. From the 20's into the 60's was the
3 manufactured gas and Coke plant activities.
4 Afterward OMC used it a little bit for storage.
5 Larsen is using it for some trailers and boat
6 storage. That's when they occurred.

7 What kind of contamination is there?

8 Remember, in the soils we have PAHS, we have
9 creosote, we have arsenic. In the groundwater we
10 have ammonia, arsenic, phenol, thiocyanate. And in
11 the surface water we're concerned about ammonia.
12 The concentrations actually vary. The PAHs go from
13 a high of 72,000 parts per million. In the soil the
14 arsenic is in the neighborhood -- the highest in the
15 4,000 parts per million range in the soil.
16 Groundwater is highly contaminated, high parts per
17 million range of ammonias.

18 What are you planning to do? PAH soils go
19 off-site, coburned. Arsenic soils stabilized on
20 site. Creosote is done off-site. Groundwater, pump
21 and treat the hottest areas. Reinfiltrate this
22 nutrient-rich water to try and degradate the stuff
23 that is already at the bottom of the aquifer. The
24 cap, the flexible cap is going to come in for future

1 use. That flexible cap is going to reduce
2 infiltration. It's going to stop or significantly
3 slow down the groundwater movement towards the lake
4 and towards the harbor. So we've got a slow-down of
5 the groundwater, which would allow it to break down.

6 Why did we choose this particular remedy?
7 We eliminated No. 1 and No. 4. One was due to cost
8 and practicality and the other one was due to its
9 probable inability to be protective. The other two
10 we did kind of a balance of the criteria, which one
11 seemed to be the best fit.

12 The next question, is it safe to be around
13 the site, as you now know, the site is pretty much
14 fenced off. There is access from the lake or the
15 harbor, but it's pretty difficult to get at the
16 site. We expect that that will be true, it will be
17 the same way through the entire remedy. There is no
18 indication that it's not safe to be around the site,
19 and when they actually get into doing the work
20 itself, the people who are doing the work, there's
21 going to be somebody who designs it and they're
22 going to be oversaw by an independent contractor of
23 the PRP or the operator's choice. EPA is going to
24 provide oversight and EPA is going to have its own

1 contractor providing oversight, and the State of
2 Illinois is probably going to provide oversight. So
3 you're going to have a number of layers of
4 redundancy to make sure that things are done right
5 and that it's done safely.

6 The next thing is there is going to be
7 sampling at the perimeter while this work is going
8 on to make sure that there is -- there is actually
9 going to be sampling right at the excavation and at
10 the perimeter to make sure there are no releases or
11 anything that we need to be concerned about. So you
12 are going to have the oversight of people who will
13 be there, multiple people, plus you're going to have
14 the oversight of the actual sampling data.

15 When will the cleanup begin? Let me tell
16 you what has to happen before the cleanup can begin.
17 We're in the proposed plan process right now. We
18 have a record of decision that needs to come out
19 after the proposed plan. The proposed plan is
20 scheduled -- the comment period is scheduled to end
21 March 23. I would say that the ROD, assuming there
22 are no changes to the remedy or assuming that people
23 don't want to extend it out a little bit more, the
24 ROD will be thirty to sixty days after that, after

1 which as soon as the ROD is developed, EPA will
2 issue what's called a special notice.

3 Special notices go to the past and present
4 owners and operators and invite them to implement
5 this remedy. They've got 120 days to sign on to a
6 consensual agreement to do this work. If they do
7 not sign on that consensual agreement, the EPA has
8 two options. They can order them to do it or we can
9 do the work ourselves and seek cost recovery.

10 So let's assume for a minute that we sign a
11 consent decree in a hundred and -- we have sixty
12 days for the ROD and then another 120 days for the
13 consent decree. So we sign a consent decree. The
14 EPA is going to ask that a pilot study be conducted
15 concurrent with the remedial design. Remedial
16 design will probably take a year and a half to two
17 years. A pilot study will probably take less than a
18 year, but we want to make sure that this interim
19 pump and treat system will really do what the design
20 says it's going to do. So before they commit this
21 full twenty some million dollar remedy, we want to
22 make sure this thing is going to work because there
23 are some complications. This is not an easy site.
24 It is not an easy mix of contaminants. It is not an

1 easy mix of media.

2 After the remedial design, then they'll
3 move into remedial action. The soils and the cap,
4 that can probably be done in a year. The interim
5 pump and treat system, probably six to seven years.
6 And you ask yourself, why would interim take six to
7 seven years to pump? Do you remember I said it was
8 at the bottom five feet of the aquifer? What we
9 want to be able to do is pump that bottom five feet
10 out without mixing that highly-contaminated stuff up
11 through the entire site. So we're going to try and
12 have those cells take water out as fast as it would
13 be coming back into the cell, and also, some of
14 these contaminants are what's called retarded. In
15 other words, you can't get them out of the pores
16 very quickly. They won't move out of the sand
17 pores.

18 So it takes some time to get that stuff out
19 and we need to do this pilot study to see how many
20 pour volumes it takes to get that to happen.

21 So then after this interim pump and treat
22 system, there's going to be a study conducted to
23 make sure that natural attenuation, biodegradation
24 is occurring. The actual truth of the matter is to

1 get to MCLs, we're actually talking about decades.
2 This is highly-contaminated groundwater with a very
3 complicated mix in the balance.

4 Who's going to pay for it? It is EPA's
5 position that the people who caused the
6 contamination are going to pay for it. This won't
7 be a taxpayer subsidized or funded cleanup. EPA
8 will ask them initially to consensually do that. If
9 they won't do it consensually, we'll order them to
10 do that. If we come to a problem with ordering,
11 we'll do the work ourselves and we will seek cost
12 recovery.

13 Where can I go to get more information?
14 What I've done is I've summarized for you a ton of
15 information. I have left out way more than I have
16 included just because I wanted to keep it short for
17 you. The remedial investigation upstairs, directly
18 upstairs, is at least four feet thick of stuff.
19 There's just a lot of stuff in it. If you go take a
20 look at the files, if you look at the back of the
21 fact sheet, there's a repository upstairs. There
22 are phone numbers. My phone number is there; Jerry
23 Willman's phone number is there; Janet Pope's phone
24 number is there. You can call any one of us. You

1 can go upstairs and you can take a look at the
2 information that's in the repository. EPA Region 5,
3 if you want to come to the office, we've got files
4 there. It's the same thing that you'll have
5 upstairs. It's the information that was important
6 to make this decision. That's where you can go to
7 get more information.

8 Two things left. You can talk -- if you
9 have any questions -- and I'm sure I have raised
10 questions -- I'll be sure to try to clarify those as
11 best I can. A lot of this information, it's hard to
12 remember it all quite honestly, so I may lean on
13 some people or promise that I'll get back to you,
14 but almost all of the questions we can typically get
15 back to.

16 We'll give you an opportunity to kind of
17 ask questions and then kind of clarify any points in
18 your mind before we go into the formal public
19 comment period. The difference is if you really
20 wanted all of your questions -- a lot of things I
21 don't think are necessarily a formal comment, you
22 just kind of want some clarification, and we can do
23 that, and then once we move into the formal comment
24 period, you can put your opinions on the record and

1 get a written response if you feel you would like to
2 do that.

3 With that, I would like to open it up to
4 any questions you may have.

5 MS. SHORTS: Peggy Shorts, County Board,
6 representing part of Waukegan. My question is
7 you're talking about removing some of the
8 contaminated soil off of the site. How do you plan
9 to do that, how is it going to be done safely, and
10 where is it going?

11 MR. BELLOT: The question was I understand
12 that you want to take some stuff off-site, some
13 contaminated soil. How is that going to be done and
14 how are you going to do it?

15 MS. SHORTS: How is it going to be done
16 safely and where's it going?

17 MR. BELLOT: How is it going to be done
18 safely and where's it going? The PAH soils, we'll
19 talk about those things. What they're going to do
20 is they're going to lift them up and they're going
21 to mix them with coal. There are a lot of
22 manufactured Coke plants across the United States
23 and what they found is there's a particular way that
24 they're allowing manufactured Coke plants to deal

1 with their particular waste. They pick it up, they
2 mix it, and they're going to go off-site with it and
3 have it burned at a coburning plant.

4 What we've done at this point is we have
5 said your objective is to get it off-site, but we
6 haven't told them where they have to go with it or
7 whether they are going to use a truck, a barge, or a
8 railroad. In the design process, that's the kind of
9 information that we want from them in design,
10 specifically how are you going to do this so we can
11 make sure that we have the review and the oversight
12 that's necessary.

13 It would not surprise me -- I mean there
14 are a lot of options as you can see with the barges,
15 the railroad, and the truck transportation. We
16 would take a look at those.

17 MR. SABONJIAN: Robert Sabonjian, District
18 8. During the course of the time that this was
19 going on, did I hear you correct when you said this
20 could take decades to actually remove most of the
21 groundwater and this material?

22 MR. BELLOT: The question was did I hear
23 you right that it could take decades for the
24 groundwater. Let's break the groundwater into two

1 pieces. There's the interim step to work with the
2 highly-contaminated stuff and then there's that
3 bottom highly-contaminated stuff. Interim steps can
4 take six to seven years. The deeper groundwater, we
5 really don't have excellent estimates just yet
6 because we want them to do this interim step first
7 and try to give us an indication of when you
8 oxygenate this water and you add the nitrate and you
9 put it back down and you've reduced it this
10 one-third -- like I said, you need to do your lab
11 studies -- what kind of breakdown are we going to
12 get? But it is not unreasonable for this to take
13 decades to get to MCLS.

14 MR. SABONJIAN: May I follow that up?
15 During the course of this, will that area be
16 available for some development or is it going to be
17 totally fenced off and isolated during the life of
18 this project?

19 MR. BELLOT: The question was during that
20 time will the site be fenced off? Will it be
21 available for development? It's important to kind
22 of keep the groundwater and the soils kind of
23 compartmentalized in your mind. The groundwater
24 remedy should not be intrusive for future

1 development with a couple of caviats.

2 Caviat one is there is going to need to be
3 a groundwater treatment facility for treatment on
4 site. We're leaning right now that it seems to make
5 the most sense to do that on top of the arsenic, to
6 stabilize the arsenic and try to treat that and put
7 the treatment system there. The only other
8 intrusive things about the cells would probably be
9 piping, but that can easily be adjusted around
10 buildings, around development.

11 So the short answer to your question is the
12 groundwater component should not impact the future
13 site development in any meaningful way. Thank you
14 for that question. Yes?

15 MR. GEONELLO: Cosmo Geonello
16 (phonetically), Waukegan, Illinois. You said that
17 the taxpayers are not going to fund this project.

18 MR. BELLOT: That's correct.

19 MR. GEONELLO: Who are the owners of this
20 property?

21 MR. BELLOT: Okay. That's an excellent
22 question too. The question is who are the owners
23 that will be invited by the EPA to participate.
24 There is the current owner that is Outboard Marine

1 Company. There is EJ&E Railroad from the
2 wood-treating creosote. There is North Shore Gas.
3 And also during a time General Motors operated the
4 Waukegan Coke plant. So those are the four
5 initially that I know will be sent invites.

6 Now, if there is a few other ones on the
7 side, that could be, but between now and the time we
8 issue special notice, I would say those four will
9 certainly get an invitation to talk to us. Yes?

10 MR. HETTINGER: Lee Hettinger, Chicago.
11 You mentioned that the ammonia exceeded a standard
12 and then you went on to say something about it did
13 not exceed a human health or ecological standard,
14 but you didn't follow through. Could you tell me
15 what you referred to --

16 MR. BELLOT: The question has to do --

17 MR. HETTINGER: -- and what standard it
18 exceeded?

19 MR. BELLOT: The question has to do with
20 the ammonia standard, and the ammonia standard is in
21 surface water. The State of Illinois developed
22 surface water quality standards and they developed
23 them for both the harbor and the lake, and the
24 harbor standards are higher. In other words, they

1 allow more contaminants in largely because of the
2 human interventions that occur in a harbor.

3 In the lake there is an open water quality
4 standard for ammonia of 20 parts per billion. 20
5 parts per billion was developed by the state in an
6 attempt to protect the natural resource of Lake
7 Michigan. They said -- it's my understanding; I
8 have had this explained to me -- that they took a
9 look at their surface water quality data and they
10 said this is about what our ammonia is. We want to
11 keep it there.

12 So it's not like health-based and it's not
13 ecologically-based, but it's a nondegradation of the
14 surface water standards. So it is really a
15 standard, there's no denying that it's promulgated
16 and it has a legal bite, but it's not a health-type
17 standard. Does that answer your question?

18 MR. HETTINGER: I just didn't know whether
19 I had heard you correctly the first time.

20 MR. BELLOT: Yes, that's correct.

21 MS. WALKER: Mary Walker. My question was
22 you started to talk about when it would begin, but
23 then you went into the length of six to seven years.
24 What if everybody signed on and it went smoothly?

1 What would be the first date that work would begin
2 on the site? And then assuming that there's the
3 potential for litigation in this, how much longer is
4 that going to go on? And then my third question is
5 how soon will the EPA Superfund step in and start
6 the project so we can get this done?

7 MR. BELLOT: Okay. There's three parts to
8 the question. I hope I can remember them all.
9 Refresh me if I don't. First of all, a little
10 refresher on how quick we could actually get to
11 work, and the second part was again how long it
12 would take, and then third, how long before EPA
13 would jump in.

14 The first question first, let me kind of
15 redo this again. The public comment period ends on
16 March 23rd. I would say the Record of Decision
17 would be out in sixty days, the end of May. June --
18 let's say, for example, June 1 we send out special
19 notice. They would have 120 days, June, July,
20 August.

21 At the end of August we would expect to
22 have a consent decree. If they did not do a consent
23 decree, it would probably take us sixty days to get
24 an order issued. So we would be looking at the

1 first part of November we would be looking to start
2 the design. Still this year we'd be looking to
3 start the design. I would say it would probably be
4 conservatively two years to design the pilot study,
5 so November of 2001. We could be looking at actual
6 in-the-field in the summer, spring of 2002.

7 How quick before EPA stepped in? It's been
8 my experience that there are a lot of disincentives
9 for not signing a consent degree and there are even
10 more disincentives for not cooperating with an
11 order. If you don't cooperate with an order, I
12 think it's 27-5 a day in fines that EPA can lay on a
13 person. So it would take a pretty stern person to
14 bluff on that. I'm not saying it won't happen, but
15 there would probably be a time -- we're deep into
16 litigation then. If someone walks from the UAO, I
17 would be afraid to guess how quick that would be.
18 It would be a very, very ugly bitter legal battle
19 because we would probably have all kinds of access
20 denied. It would be a very, very difficult battle.
21 I can't even give you a very good answer, Mary. I'm
22 sorry. It would be a nightmare at that point.

23 MR. FLINK: My name is John Flink. My
24 question is the alternative that you have chosen,

1 how is that going to address those two plumes that
2 are headed towards Lake Michigan?

3 MR. BELLOT: The question was how will the
4 alternative that's chosen address the two plumes
5 that are headed towards Lake Michigan.

6 MR. FLINK: Specifically Alternative 3.

7 MR. BELLOT: Specifically Alternative 3.
8 Alternative 3, what it proposes to do is go in with
9 the cell system and what we'll try to do is get the
10 leading edge or the forward edge of the plume first
11 and remove the contamination there first, bring it
12 up, reinject this nutrient-rich stuff. So the
13 treatment itself starts at the leading edge, pulls
14 up the contamination, treats it, reinjects it, and
15 then we'll move backwards toward the site away from
16 Lake Michigan. So the idea is to actually get the
17 leading edge first, but then move back and get the
18 entire hot spot and actually do the same thing
19 actually from the mirror image on the other side,
20 start closest to the harbor and move backward toward
21 the site.

22 The other thing I would -- actually you
23 raised a point that I should mention. These
24 drawings are kind of based on our most current

1 information. What we're going to ask the
2 participants to do is go out and do a thorough
3 groundwater sampling to make sure that we know the
4 size of these plumes, the direction of these plumes,
5 the magnitude of these plumes. So before they go
6 out and just say we put in ten cells and now we're
7 done, we found out we really didn't know where this
8 leading edge is, we're going to have to have a
9 pretty comprehensive groundwater study to make sure
10 we understand where these plumes are. Does that
11 answer your question?

12 MR. FLINK: Yes, it does.

13 MR. BELLOT: Okay. There's a question in
14 the back.

15 MS. KUBILLUS: Sandy Kubillus. I was just
16 wondering whether this study or if the remediation
17 doesn't happen for two or three more years, what's
18 the contamination likely to be in groundwater that
19 reaches the shoreline area because that beach gets
20 pretty heavily used in the summer and I just wonder
21 if there would be any restrictions on using that
22 beach.

23 MR. BELLOT: Excellent question. The
24 question has to do with if groundwater movement

1 continues towards surface water and any restrictions
2 on the beach. That's an excellent question.

3 The thing that I would stress here is the
4 groundwater is discharging down beneath the surface
5 water. There will be ongoing discharges to Lake
6 Michigan. The important thing that we're trying to
7 do is get that big thumbprint and that slug. Right
8 now the discharges to surface water are not causing
9 exceedances other than ammonia and it's not a
10 health-based standard. There should not be, unless
11 the situation changes -- and we're going to continue
12 to monitor surface water -- unless the situation
13 changes, there should not be any restrictions to
14 surface water use in that area, but we will continue
15 to sample routinely to make sure that that is indeed
16 the scenario.

17 MR. PFISTER: Mark Pfister, Lake County
18 Health Department. Just to follow up on those last
19 two questions, is the plume based on actual
20 measurements to date or is that computer modeling?

21 MR. BELLOT: It's actually both. The
22 question is is this real data or is this a model and
23 the answer is both because we used real data and put
24 it in a model, so the data that has been put into

1 this model is factual, but there is a lot of
2 interpretation in a model and that's why it's so
3 important for us to go out and do that next ground
4 sampling to make sure that we understand entirely
5 where this plume is.

6 MR. PFISTER: A second part of that
7 question is what is the estimated time of movement,
8 time for that plume to reach Lake Michigan at this
9 point?

10 MR. BELLOT: That's an excellent question.
11 The question is what is an estimate of the time for
12 that plume to get to Lake Michigan? Can you help
13 me? I would like to introduce Phil Smith. He is my
14 technical right-hand man for EPA and I think he is
15 doing a calculation. Can you give me a ballpark?

16 MR. SMITH: Well, I would have to almost
17 defer to Jim, but correct me if I'm wrong, are the
18 groundwater level velocities roughly a foot per day
19 on retarded?

20 A VOICE: A third of that.

21 MR. SMITH: We're talking years for the
22 main force of the plume to move out on the lake and
23 discharge. We have ten years at least. That's the
24 kind of time frame we're talking about.

1 MR. BELLOT: We're talking more than ten
2 years. And that's consistent with -- if you think
3 about how long ago it's been since the discharge has
4 stopped and how much it's moved, to me that's
5 intuitively -- that seems to match, that it hasn't
6 moved rapidly to Lake Michigan.

7 MR. SABONJIAN: Yes, Robert Sabonjian,
8 District 8 County Board. Two questions. One, have
9 we seen any of this material, any hint of this
10 showing up in the drinking water supply? And number
11 two is will it require reengineering of the intake
12 for our drinking water supply if you begin to do
13 this work? Just for safety sake will they have to
14 run that out further into the lake?

15 MR. BELLOT: The question is two-fold.
16 First of all, have we seen any change in the
17 drinking water qualities, because as you may or may
18 not know, the drinking water intake is in Lake
19 Michigan, and would it require any reengineering to
20 move that drinking water intake further out?

21 The first question is -- let me back up
22 just for a second and say kind of a good thing/bad
23 thing is Lake Michigan is very big and it has a huge
24 dilution effect, so on one side that's kind of a

1 good thing, on the other side it's kind of a bad
2 thing because it's Lake Michigan. At this point the
3 long shore current and the near shore current mix so
4 rapidly it moves so quickly in there that it's not
5 very likely that we would ever see a problem. In
6 fact, we have to look really pretty hard and really
7 bias our sampling to find the ammonia exceeds and we
8 just haven't seen the other ones.

9 So the second part to your question is it's
10 highly unlikely. But let me caviat that by saying
11 we're going to continue to sample surface water
12 routinely and if at any time that looks like that
13 needs to be done, we would do that because that
14 would be a colossal concern to us.

15 MR. LARSEN: Jerry Larsen. You have
16 referred to quite a bit of that property or how much
17 property I don't know being covered with an asphalt
18 cap, what you referred to as I believe a flexible
19 cap. My question is what's a flexible cap, how much
20 property will be covered by that cap, and would the
21 property under that cap be usable?

22 MR. BELLOT: The question has to do with
23 the flexible versus the asphalt cap and how big this
24 cap would be and what it would do to perhaps limit

1 use. What I was trying to do actually and probably
2 didn't do as good a job as I would like to is
3 distinguish Alternative 2 from Alternative 3.

4 Alternative 2 included a very large asphalt cap and

5 Alternative 3 is the one we're leaning
6 towards because it was the flexible cover, and what
7 I mean by -- what I was trying to get by flexible
8 cover is it starts vegetative and then if future
9 development would want buildings, depending on the
10 kind of building or asphalt, they could do that.

11 The exact size of the cap -- do we have an estimate
12 of that? I'm sorry. I'm kind of looking around
13 here.

14 A VOICE: 20.

15 MR. BELLOT: 20 acre cap, in that
16 neighborhood, and it should not -- the idea of this
17 particular cap was to be as flexible as possible for
18 future development. So it's our intent that it does
19 not stand in the way of future development with some
20 caviats on it. Certainly things that don't need to
21 go deep and buildings that are asphalt or concrete,
22 those are all viable options. Boat storage, that
23 kind of thing, absolutely.

24 MR. CRAWFORD: Roger Crawford. I have two

1 questions. The first one has to do with the
2 groundwater and the effect on construction. Would
3 it affect in any way the maintenance or construction
4 of utilities to support either building development
5 on that site or nearby buildings and maintenance?

6 MR. BELLOT: The question has to do with if
7 you put this system in, is it going to interfere --
8 is the maintenance going to interfere with
9 construction? Is that kind of the --

10 MR. CRAWFORD: No. The code requires that
11 sewers be constructed at a certain depth and
12 utilities placed at a certain depth and these are
13 below ground level, and so any construction in this
14 area that has services has some --

15 MR. BELLOT: I understand what you're
16 saying. The significance of what he is saying is
17 what if you have to go down into groundwater. Yes,
18 the restrictions on this site in some ways may
19 impede those type of things. I don't think they'll
20 stop them, but there may have to be some specific
21 actions taken, and that's where the soils management
22 plan would be so important so people know what's
23 expected and required, because if you have to go out
24 there and start dewatering contaminated water,

1 someone is going to have to deal with that water and
2 it's going to have to be done appropriately. So my
3 short answer to you is yes, that would impact that
4 sort of thing.

5 MR. COAN: Michael Coan. I'm an architect,
6 and I'm just following up his question. Have you
7 monitored the groundwater levels on the site?

8 MR. BELLOT: The question is have we
9 monitored the groundwater levels as in height. Is
10 that what you're talking about?

11 MR. COAN: That's correct.

12 MR. BELLOT: Excellent question. Phil, can
13 you help me here? Do you know?

14 MR. SMITH: Sure. It's about four foot
15 down to groundwater. Is that what you're asking?

16 MR. BELLOT: I'm sorry. I thought -- did
17 we monitor fluctuation -- my mistake. The question
18 was do we know how deep it is to groundwater. It's
19 about four feet, between three and four feet.

20 MR. COAN: Second question. The record
21 that was purported to be the administrative record,
22 have any documents been submitted that are not
23 contained in the record?

24 MR. BELLOT: The question is what if -- it

1 has to do with the administrative record. The
2 administrative record, let me give you a little
3 background first and then I'll repeat the question.
4 It has to do with what if you want documents entered
5 into the administrative record. If someone has a
6 document that they would like entered into the
7 administrative record, please forward it to my
8 attention. What we did is we tried to rely on the
9 documents. We put the documents in the
10 administrative record that we relied on for the
11 decision. Often people ask me if I would add things
12 to the administrative record. Send them to me
13 directly and I will absolutely consider whether they
14 should be added.

15 MR. COAN: My comment today is there are
16 other records that were not included and I wondered
17 if that was --

18 MR. BELLOT: Whether it was intentionally?

19 MR. COAN: Yes.

20 MR. BELLOT: The question was whether there
21 were specifically documents intentionally kept out.
22 No. If you have something you would like added to
23 it, I would certainly be willing to consider that.

24 If we don't have any more questions --

1 Janet, how do you propose that this is done? Do
2 they speak to you or how would you --

3 MS. POPE: They would get up and speak --
4 well, this is the time for the public comment
5 period, and in the public comment period you can ask
6 questions, you can make statements, opinions,
7 whatever you want to say, but we will not respond to
8 those questions or anything. They will be responded
9 to in our responsiveness summary.

10 So if anybody wants to get up and say
11 anything, at this point you can get up and say it,
12 whatever, but Mike will not be responding to it at
13 this time.

14 Now, if anybody doesn't have anything to
15 say and maybe has extra questions or whatever at
16 this point, either Mike and I could keep moving in
17 that direction or we could start the public comment
18 period now.

19 MR. BELLOT: And the other thing that I
20 would stress is this isn't your only opportunity.
21 I'm not very good -- I don't know how you are with
22 just standing up asking a question. If you would
23 prefer to, on the back of a fact sheet you can write
24 your question and you can mail it to us. You can

1 mail it to me. You can -- whatever works best for
2 you. Some people like to think about it a little
3 bit, think about the information. They like to go
4 look at the repository. So please don't think that
5 this is your only opportunity to talk about this.
6 You have got until March 23rd.

7 A VOICE: I wondered if you could show
8 those slides with the three plumes again, the
9 arsenic, and perhaps indicate the direction that
10 it's moving. Would that be possible?

11 MR. BELLOT: This is the arsenic plume.

12 A VOICE: And Lake Michigan is to the
13 right?

14 MR. BELLOT: Lake Michigan would be over
15 here and over here is the harbor. I can hardly make
16 out that scale.

17 A VOICE: The plume is moving which way?

18 MR. BELLOT: There's a divide about here.
19 The plume is moving this way towards Lake Michigan
20 and then over here it's moving this way towards the
21 harbor. And the next one is the phenol.

22 A VOICE: Where is that in reference to the
23 Coke?

24 MR. BELLOT: I think the Coke plant would

1 have been right in here. That's the phenol. And
2 that's the ammonia. The significant portions are
3 right here and right here.

4 A VOICE: Thanks a lot.

5 MR. BELLOT: You bet.

6 MS. POPE: Are there any more questions at
7 this time?

8 MR. REHOR: Mike Rehor. Can you talk a
9 little bit about Alternative 3B?

10 MR. BELLOT: Within each of the
11 alternatives there were subalternatives and a lot of
12 them have to do with what happens once it goes
13 off-site. If I remember correctly, 3B went off-site
14 to a disposal facility. The EPA has a preference
15 for treatment of what we call principal contaminants
16 and we identified the PAHs and the arsenic as
17 principal threats. Principal threats, EPA has a
18 bias for treatment. So that's why EPA was leaning
19 towards the treatment alternative rather than your
20 traditional landfilling of the waste. The
21 difference is what happens to the waste. Do you
22 bring them up and treat them or do you take them
23 off-site and bury them someplace else? Does that
24 get to your question?

1 MR. REHOR: Yes.

2 MS. POPE: Are there any more questions?
3 At this time we can move into the public comment
4 period. At this time you can stand up and say
5 whatever you want to say at this time, but we will
6 not be responding. We will be responding in a
7 responsiveness summary. So anybody can stand who
8 would like to get up. Does anybody want to start
9 the public comment period? Well, do we have any
10 more questions you want answers to? No questions?

11 MS. WALKER: Mary Walker. Some of the
12 documents are down in the Port District Office too.
13 They were sent to us originally.

14 MR. BELLOT: I'm also available for other
15 speaking engagements if someone would like for --

16 MR. SABONJIAN: I would like to extend the
17 invitation that you come to the Lake County Board to
18 make an informative presentation as done here so
19 that the county board and the members can see what
20 we're up against in this area.

21 MS. POPE: Any other questions? If not,
22 thank you all very much.

23 MS. WALKER: Mary Walker again. I would
24 like to go on record as recommending Alternative 3

1 because of its flexibility. Every one of us has
2 been looking at future expansion in the Waukegan
3 area and especially in our industrial area. We may
4 not all agree on what means or which method, but we
5 would like to see and I would like to see the most
6 expedient alternative to a future use of that site.

7 MS. POPE: Any other comments? Jerry, do
8 you have anything you want to say?

9 MR. WILLMAN: No.

10 MS. POPE: Well, we would like to thank you
11 for coming out. Do you have anything else to say,
12 Mike?

13 MR. BELLOT: No. I am available. My
14 number is on the back. I left cards at the table.
15 My number is on the back of the fact sheet. Please
16 feel free to contact me and I promise you I'll get
17 back to you.

18 MS. POPE: And remember the public comment
19 period, March 23rd. Send in your comments. Thank
20 you all for coming.

1 STATE OF ILLINOIS)
2) SS:
3 COUNTY OF LAKE)
4

5 I, CINDY BENNER, do hereby certify that I am
6 a certified shorthand reporter doing business in the
7 County of Lake and State of Illinois, that I
8 reported in shorthand the foregoing proceedings
9 taken on Wednesday, March 3, 1999 and that the
10 foregoing is a true and accurate transcript of my
11 shorthand notes so taken as aforesaid.
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